

**DOCKET SECTION**

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

Postal Rate and Fee Changes, 1997

FEB 11 2 13 PM '98  
Docket No. R97-1

**NEWSPAPER ASSOCIATION OF AMERICA  
ANSWERS TO  
INTERROGATORIES OF ADVO, INC. (ADVO/NAA-T1-1-4)  
February 11, 1998**

The Newspaper Association of America hereby provides its answers to the following interrogatories of Advo, Inc. (ADVO/NAA-T1-1-4) filed on January 28, 1998.

Each interrogatory is stated verbatim and is followed by the answer.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann  
NEWSPAPER ASSOCIATION OF AMERICA  
529 14th Street, N.W.  
Suite 440  
Washington, D.C.  
(202) 638-4792

By: William B. Baker  
William B. Baker  
  
WILEY, REIN & FIELDING  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 429-7255

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

February 11, 1998

William B. Baker  
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA  
ANSWERS TO INTERROGATORIES OF ADVO, INC.

ADVO/NAA-1. Please confirm that, in the past, NAA has conducted surveys and/or prepared reports on the mail usage of its member newspapers.

- (a) Please list each such survey or report since 1985, including a brief description and time frame of each item.
- (b) Please provide a copy of each such survey or report.
- (c) To the extent available from the above or other sources, please provide a summary of mail usage, by subclass and rate category, since 1985.

Answer:

Confirmed.

- (a) NAA has no such surveys or reports other than those mentioned below.

Although NAA's predecessor organizations from time to time conducted earlier studies of the mail usage of newspapers, NAA no longer possesses those surveys.

(i) The 1992 Circulation & Product Distribution Survey Summary Report provides an overview of circulation operations, insert and non-subscriber product distribution practices, developing use of database methodologies, and industry use of the USPS. The survey reflects 1992 data unless otherwise noted.

(ii) The 1993 Nonsubscriber Product & Distribution Survey Summary Report provides an overview of non-subscriber products and distribution

NEWSPAPER ASSOCIATION OF AMERICA  
ANSWERS TO INTERROGATORIES OF ADVO, INC.

systems at U.S. daily newspapers, and, unless otherwise noted, reflects 1993 data. NAA believes that the information obtained through this study is valid only as to the respondents and is not necessarily representative of its member newspapers.

(iii) Certain information regarding circulation and mail usage is presented in 1995 Circulation Facts, Figures and Logic, an NAA survey regarding circulation practices. That survey indicates that, for the six month period ending September 30, 1994, daily mail accounted for 1.5 percent of the distribution of average circulation of newspapers responding to the survey.

(iv) Certain information regarding circulation and mail usage is expected to be contained in 1997 Circulation Facts, Figures and Logic. This report is currently in production and should be available by the end of March 1998.

(v) Certain information regarding the mail usage of NAA member newspapers is expected to be contained in a 1997 NAA Postal Survey. This report, which will be based on 1997 data, is not yet available and NAA is unable to state at this point when it will become available.

NEWSPAPER ASSOCIATION OF AMERICA  
ANSWERS TO INTERROGATORIES OF ADVO, INC.

- (b) The 1992 Circulation & Product Distribution Survey Summary Report and 1993 Nonsubscriber Product & Distribution Survey Summary Report are out of print and copies are no longer available. Copies of these documents were filed in Docket No. MC95-1 as Library References NAA/MC95-1 LR-4 and NAA/MC95-1 LR-5, respectively.

A copy of the 1995 Circulation Facts, Figures, and Logic survey is being filed as Library Reference NAA/R97-1 LR-1.

- (c) See 1995 Circulation Facts, Figures and Logic and 1992 Product Distribution Survey Summary Report, referenced in (a) above.

NEWSPAPER ASSOCIATION OF AMERICA  
ANSWERS TO INTERROGATORIES OF ADVO, INC.

ADVO/NAA-2. Has NAA or any of its predecessor organizations undertaken or sponsored any surveys, studies, reports, or analyses that relate in any manner to changes or trends in the usage of third-class mail by newspapers since 1985?

- (a) If so, please list each of them, including a brief description and time frame of each item.
- (b) Please provide a copy of each.

Answer:

(a) and (b) NAA and (to its knowledge) its predecessor organizations have only undertaken or sponsored surveys, etc. regarding "changes or trends" to the degree described in its Answer to ADVO/NAA-1 above.

NEWSPAPER ASSOCIATION OF AMERICA  
ANSWERS TO INTERROGATORIES OF ADVO, INC.

ADVO/NAA-3. Does NAA have any information, either from surveys, reports or other sources, concerning or relating to the implementation or usage of nonsubscriber or total market coverage programs, or changes or trends in the usage of such programs, by newspapers since 1985?

- (a) If so, please provide such information, including a list, brief description, and time frame of each source document.
- (b) Please provide a copy of each source document.

Answer:

- (a) The request for "any" information from any "source" is extremely vague and overbroad. Notwithstanding these concerns, NAA states that, in addition to the documents described in its Answer to ADVO/NAA-1 above, the 1994 Alternate Delivery Survey Summary Report provides information responsive to this request. This 1994 survey has not been updated due to a lack of interest.
- (b) See ADVO/NAA-1 (c) above. The 1994 Alternate Delivery Survey Summary Report is out of print and copies are no longer available. A copy of this document was filed in Docket No. MC95-1 as Library Reference NAA/MC95-1 LR-1.

NEWSPAPER ASSOCIATION OF AMERICA  
ANSWERS TO INTERROGATORIES OF ADVO, INC.

ADVO/NAA-T1-4. Does NAA have any information, either from surveys, reports or other sources, concerning or relating to shifts, changes or trends in the usage of third-class mail and alternate delivery for distribution of nonsubscriber or total market coverage products by newspapers since 1985?

- (a) If so, please provide such information, including a list, brief description, and time frame of each source document.
- (b) Please provide a copy of each source document.

Answer:

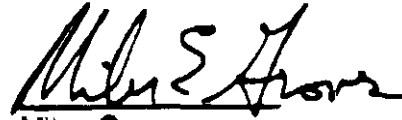
(a) The request for "any" information from any "source" is extremely vague and overbroad. Notwithstanding these concerns, NAA states that the documents described in ADVO/NAA-1(a) and ADVO/NAA-3 above may provide information pertaining to particular periods of time, subject to caveats regarding validity and representativeness. In addition, NAA from time to time has purchased on the open market commercially available non-NAA marketing information from sources such as Editor and Publisher magazine and Claritas, which it believes are generally available to any interested purchaser.

- (b) See Library References NAA/R97-1 LR 1.

**DECLARATION**

I, Miles Groves, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Date. 2/11/98

  
Miles Groves